

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: AT&T Communications of New England, Set #1

DATED: August 10, 2001

ITEM: ATT-VZ 1-3 Based on your knowledge of the E911 rules requiring the listing of telephone numbers in the E911 database, please state whether a telecommunications provider in the following hypothetical situations is required to register a telephone number in the E911 database:

- a) Telecommunications provider provides local and long distance service from its own switch to an end-user with a PBX switch over facilities obtained from Verizon pursuant to Verizon's special access tariffs (calls can originate from the end-user);
- b) Telecommunications provider provides mobile wireless service from its own switch to an end-user customer who can originate calls on that customer's number;
- c) Telecommunications provider provides payphone service to the public using lines leased from Verizon.

Please explain your answers and cite to and provide copies of all documentation that supports your answer.

**SUPPLEMENTAL
REPLY:**

Verizon MA objects to this request to the extent it seeks a legal opinion as to the interpretation of state and federal statutes and rules which set forth the requirements for other carriers to list telephone numbers in a E911 database. Specifically, the legal requirements for carriers relating to the provision of E911 in Massachusetts are contained in M.G.L. c. 166§14A, 560 C.M.R. § 2.00, and FCC rules.

Verizon believes that all telecommunication carriers operating in the State of MA are obligated to fully comply with MA State emergency service rules and regulations as well as those imposed by the Federal

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Communications Commission (FCC). In keeping with these obligations, it is incumbent upon each carrier to be fully versed in and have first hand knowledge of MA and FCC emergency service rules and regulations. Subject to and without waiver of its objection, Verizon MA further observes the following, based on its understanding of E911 rules and Company practices.

- a. The telecommunications provider is required to provide a listing in the E911 database when it provides dial tone to the end user.
- b. Where E911 wireless Phase I emergency rules are not yet implemented in Massachusetts, the telecommunications provider is not required to provide a listing.
- c. The telecommunications provider is required to provide a listing in the E911 database when it provides dial tone to the public. An underlying provider of facilities that may be used by the telecommunications provider bears no responsibility for the E911 listing because it is not providing the service to the public.

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